

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA

V.

JARED EDWARD JAUREQUI

Defendant(s).

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**Criminal No: 1:19-CR-00253-TSE
Motions: 09/17/2020
Trial: 01/19/2021
Judge: T.S. Ellis, III**

**MOTION FOR REVIEW AND RECONSIDERATION OF BOND
WITH MEMORANDUM OF POINTS AND AUTHORITIES**

COMES NOW, Defendant, **JARED EDWARD JAUREQUI**, by and through, John O. Iweanoge, II and THE IWEANOGES FIRM, PC, his attorneys, hereby moves this Honorable Court for review and reconsideration of his bond pending trial pursuant to Title 18 United States Code § 3142(f) and in support of this motion, defendant by and through counsel states:

1. That this Court issued a bench warrant for Mr. Jaurequi's arrest for failure to appear for supervised release violation on July 9, 2020.
2. That Mr. Jaurequi was granted by this Court's Order till July 20, 2020 to file a motion for reconsideration which was denied by this Court on July 23, 2020.
3. That subsequently, Mr. Jaurequi who was taken into custody in Las Vegas, NV by the US Marshals on July 17, 2020 is in custody at the Alexandria ADC.
4. That Mr. Jaurequi has requested in the past to participate in in-patient drug rehabilitation treatment. However, because his case is an Eastern District of Virginia case, the District of Nevada Pre-trial services were unable to place him in in-patient drug rehabilitation treatment which are reserved for Nevada cases.

5. That at this present time, Mr. Jaurequi who is in custody at the Alexandria ADC can avail himself of in-patient drug rehabilitation treatment offered through Pre-trial here in the Eastern District of Virginia.
6. That in the interest of Justice, Mr. Jaurequi respectfully request that the Court modify his bond and detention at the Alexandria ADC by ordering that he be placed in a bed-to-bed transfer to an in-patient drug rehabilitation treatment here in the Eastern District of Virginia through Pre-trial Services Agency.
7. That this bed-to-bed placement assures Mr. Jaurequi's presence in the Eastern District of Virginia as well as his appearance for all future Court dates.
8. That Mr. Jaurequi is not a danger to the community nor has he been charged with a violent or dangerous offense in the case before this Honorable court.
9. Accordingly, the Supreme Court has observed that "[i]n our society liberty is the norm, and detention prior to trial or without trial is the carefully limited exception." See *United States v. Salerno*, 481 U.S. 739, 747, 107 S.Ct. 2095, 2101 (1987).
10. For such other and further relief as the nature of Defendant's cause requires and this Court deems proper in the interest of Justice and Judicial economy.

WHEREFORE, Defendant, **JARED EDWARD JAUREQUI**, prays this Honorable Court for a bed-to-bed transfer placement in an in-patient drug rehabilitation treatment in the Eastern District of Virginia through Pre-trial Services Agency and/or for another compelling reason that will be posited at a hearing on this motion.

Respectfully submitted,

Jared Edward Jaurequi
Defendant by Counsel

THE IWEANOGES FIRM, PC

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of August, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Alexander P. Berrang, AUSA
Matthew Lamberti, Senior Counsel (US-DOJ)
United States Attorney's Office
for the Eastern District of Virginia
2100 Jamieson Avenue
Alexandria, Virginia 22314

Dated: 21st day of August, 2020.

/S/JohnOIweanoge/S/
John O. Iweanoge, II